

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**IP COMMUNICATIONS SOLUTIONS,
LLC,**

Plaintiff,

v.

AT&T SERVICES, INC.,

Defendant.

Case No. 1:16-CV-00227-GMS

PATENT CASE

JURY TRIAL DEMANDED

CONSENT MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Plaintiff IP Communication Solutions, LLC (“IPCS”) respectfully requests leave to file an Amended Complaint. Attached hereto as Exhibit 1 is a copy of the Amended Complaint. Attached hereto as Exhibit 2 is a redline copy of the Amended Complaint, showing the amendments in relation to the Original Complaint previously filed in this matter (Dkt. 1). Defendant AT&T Services, Inc. (“AT&T”) has consented to the filing of this Amended Complaint.¹

WHEREFORE, IPCS respectfully requests that the Court grant this consent motion and permit IPCS to file its Amended Complaint.

¹ AT&T’s consent to the filing of the Amended Complaint is not a concession that the allegations in the Amended Complaint have merit or are sufficiently pled.

DATED: July 25, 2016

IP COMMUNICATION SOLUTIONS, LLC

By: /s/ Timothy Devlin
Timothy Devlin (# 4241)
Devlin Law Firm LLC
1306 N. Broom Street, 1st Floor
Wilmington, DE 19806
302-449-9010
tdevlin@devlinlawfirm.com

Timothy E. Grochocinski
Illinois Bar No. 6295055
Joseph P. Oldaker
Illinois Bar No. 6295319
NELSON BUMGARDNER, P.C.
15020 S. Ravinia Ave., Suite 29
Orland Park, Illinois 60462
P. 708-675-1975
tim@nelbum.com
joseph@nelbum.com

COUNSEL FOR PLAINTIFF
IP COMMUNICATION SOLUTIONS, LLC

CERTIFICATE OF CONFERENCE UNDER RULE 7.1

The undersigned attorney hereby certifies that counsel for Plaintiff has conferred with counsel for Defendant and there is no opposition to the relief requested in this motion.

/s/ Timothy Devlin
Timothy Devlin

SO ORDERED THIS ____ day of July, 2016.

U.S. District Court Judge

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served on all counsel of record on July 25, 2016 via the Court's CM/ECF system.

/s/ Timothy Devlin
Timothy Devlin